

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**IN RE IGLOO PRODUCTS COOLER  
RECALL LITIGATION**

Civil Action No.: 1:25-cv-00298-JLH-EGT  
CONSOLIDATED

---

**STIPULATION AND [PROPOSED] ORDER REGARDING EXTENSION OF TIME  
FOR DEFENDANT’S REPLY IN SUPPORT OF MOTIONS TO DISMISS AND STRIKE**

WHEREAS, Plaintiffs filed the Consolidated Class Action Complaint (“Consolidated Complaint”) on October 21, 2025 (D.I. 58);

WHEREAS, Defendant Igloo Products Corporation (“Defendant”) filed its Motion to Dismiss Consolidated Class Action Complaint (ECF No. 62 – the “Motion to Dismiss”) and its Motion to Strike Nationwide Class Allegations Pursuant to Rule 23(d)(1)(D) (ECF No. 64 – the “Motion to Strike”) on November 20, 2025;

WHEREAS, the parties previously stipulated that Plaintiffs’ response to both the Motion to Dismiss and the Motion to Strike would be due December 22, 2025 and Defendant’s replies would be due January 12, 2026 (ECF No. 66);

WHEREAS, the three-week period between December 22, 2025 and January 12, 2026 includes four business days on which Defendant’s offices and Defendant’s counsel’s offices are closed for the holidays;

WHEREAS, due to this extended holiday schedule, Defendant’s counsel requested a one-week extension to January 20, 2026 to file its replies in support of its Motion to Dismiss and Motion Strike in order to allow sufficient time to prepare its replies;

WHEREAS, the parties have conferred and have agreed that any replies filed by Defendant in support of its Motion to Dismiss and Motion to Strike will be due January 20, 2026.

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that:

1) Defendant's replies in support of the Motion to Dismiss Consolidated Class Action Complaint (ECF No. 62) and the Motion to Strike Nationwide Class Allegations Pursuant to Rule 23(d)(1)(D) (ECF No. 64) are due January 20, 2026.

Dated: December 12, 2025

THE ROSNER LAW GROUP LLC

/s/ Zhao Liu

Frederick Brian Rosner (#3995)  
Zhao (Ruby) Liu (#6436)  
824 Market Street, Suite 810  
Wilmington, DE 19801  
(302) 777-1111  
rosner@teamrosner.com  
liu@teamrosner.com

*Plaintiffs' Delaware Counsel*

TUSAN LAW, PC  
Christina Tusan (pro hac vice)  
Adrian Barnes (pro hac vice)  
680 E. Colorado Blvd. #180  
Pasadena, CA 91101  
Telephone: (626) 418-8203  
Facsimile: (626) 619-8253  
ctusan@ctusanlaw.com  
abarnes@ctusanlaw.com

KAPLAN FOX & KILSHEIMER LLP  
Matthew B. George (pro hac vice)  
Laurence D. King (pro hac vice)  
Clarissa R. Olivares (pro hac vice)  
Walter Howe (pro hac vice)  
1999 Harrison Street, Suite 1501  
Oakland, CA 94612

COZEN O'CONNOR

/s/ Kaan Ekiner

Kaan Ekiner (#5607)  
1201 North Market Street, Suite 1001  
Wilmington, Delaware 19801  
(302) 295-2046  
kekiner@cozen.com

Erica Rutner (pro hac vice)  
Michael Puretz (pro hac vice)  
1801 N Military Trail, Suite 200  
Boca Raton, Florida 33431  
(561) 245-6120  
erutner@cozen.com  
mpuretz@cozen.com

John A. Bertino (pro hac vice)  
2001 M Street NW, Suite 500  
Washington, DC 20036  
(202) 912-4881  
jbertino@cozen.com

*Attorneys for Defendant  
Igloo Products Corp.*

Telephone: (415) 772-4700  
Facsimile: (415) 772-4707  
mgeorge@kaplanfox.com  
lking@kaplanfox.com  
colivares@kaplanfox.com  
howe@kaplanfox.com

*Interim Co-Lead Class Counsel*

SO ORDERED this \_\_\_\_\_ day of December 2025.

---

UNITED STATES MAGISTRATE JUDGE